

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

PATRICK EDDINGTON,
1000 Massachusetts Avenue
Washington, DC 20001

Plaintiff,

v.

CENTRAL INTELLIGENCE AGENCY,
Office of Public Affairs
Washington, D.C. 20505

Defendant.

Case No. 19-cv-2942

COMPLAINT

1. Plaintiff, PATRICK EDDINGTON files this Freedom of Information Act suit to force Defendants CENTRAL INTELLIGENCE AGENCY and OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, to produce records related to any records that mentions himself, Patrick Glenn Eddington, from April 3, 1981 to the present.

PARTIES

2. Plaintiff EDDINGTON is a policy analyst and scholar at the Cato Institute and made the FOIA request.

3. Defendant CENTRAL INTELLIGENCE AGENCY is a federal agency subject to the Freedom of Information Act, 5 U.S.C. § 552.

JURISDICTION AND VENUE

4. This case is brought under 5 U.S.C. § 552(a)(6)(c)(i) and presents a federal question conferring jurisdiction on this Court.

5. Venue is proper under 5 U.S.C. § 552(a)(4)(B).

CIA'S FOIA VIOLATION

6. On April 5, 2019, EDDINGTON submitted a FOIA request to CIA: “[a]ll records in the possession of CIA that mention me under any of the names listed above from April 3, 1981 to the present.” Exhibit A.

7. On April 18, 2019, CIA acknowledged receipt of the request and assigned reference number P-2019-00252 to the matter. Exhibit B.

8. CIA has not issued a determination regarding EDDINGTON's request.

9. As of the date of this filing, CIA has produced no records responsive to the request.

COUNT I – CIA'S VIOLATION OF FOIA

10. The above paragraphs are incorporated herein.

11. CIA is an agency subject to FOIA.

12. The requested records are not exempt under FOIA.

13. CIA has failed to produce the requested records.

WHEREFORE, Plaintiff asks the Court to:

- i. Order Defendants to conduct a reasonable search for records and to produce all non-exempt requested records;
- ii. Award Plaintiff's attorney fees and costs; and
- iii. Enter any other relief the Court deems appropriate.

Dated: October 1, 2019

Respectfully Submitted,

/s/ Joshua Hart Burday

Attorneys for Plaintiff

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